

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation;  
AMAZON.COM SERVICES LLC, a Delaware  
limited liability company; and KONINKLIJKE  
PHILIPS N.V., a Netherlands public limited  
liability company,

Plaintiffs,

v.

HUMBERTO GONZALEZ, an individual;  
CAROLINA MANTILLA HENAO, an individual;  
JOSE DAVID GONZALEZ, an individual;  
RICHARDO ROJAS, an individual; JONLER  
MOFFA, an individual; JUAN JOSE MEZA, an  
individual; LUZ MARINA HENAO, an individual;  
WORLD WIDE PRODUCTS, INC., a Florida  
Corporation; CORABLADE INC., a Florida  
corporation; CAFÉ RECORS PRODUCTIONS,  
INC., a Florida corporation; EASY SELLER INC.,  
a Florida corporation; ECOMMERCE  
DISTRIBUTOR, INC., a Florida corporation;  
ION INTERNATIONAL PRODUCTS INC. a  
Florida corporation; VERENZA IMPORTS, INC., a  
Florida corporation; AAA SAFEWAY  
TRANSPORTATION, INC., a Florida Corporation;  
and DOES 1-10,

Defendants.

NO. 2:22-cv-01671-RSL

**STIPULATED MOTION AND  
ORDER TO EXTEND TIME TO  
RESPOND TO COMPLAINT**

**STIPULATED MOTION**

COME NOW, the parties, by and through their counsel of record, and submit the following  
stipulated motion and proposed order to extend the time for defendants to answer or otherwise

1 respond to the Complaint until and including February 9, 2024. The grounds for this motion are  
2 as follows:

3 1. The first Defendant served with the Complaint, Defendant Moffa, was served on  
4 December 5, 2023, making his response to the Complaint due on December 26, 2023, the day  
5 after Christmas.  
6

7 2. Other Defendants were served subsequently.

8 3. Defendants contacted and engaged counsel to represent them in this matter on  
9 December 14, 2023.

10 4. The Complaint is lengthy, alleges four causes of action, contains 118 paragraphs,  
11 and has several lengthy exhibits.  
12

13 5. The requested extension will give Defendants and their counsel time to  
14 adequately prepare their response(s) to the Complaint and will not prejudice the Plaintiffs, as this  
15 action was stayed after an Ex Parte motion of Plaintiffs from December 1, 2022 (*see* Dkt. # 9)  
16 until November 9, 2023 (*see* Dkt. # 13).

17 6. This is the first request that any Defendant has made for an extension of time to  
18 respond to the Complaint.

19 For the reasons set forth above the Defendants respectfully request that they be granted  
20 an extension until and including February 9, 2024 to answer or otherwise respond to the  
21 Complaint. Plaintiffs agree to this request and have courteously joined in this motion.  
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24 ///

25 ///

26 IT IS SO STIPULATED this 15th day of December, 2023.

CHRISTIE LAW GROUP, PLLC

DAVIS WRIGHT TREMAINE

By /s/ Robert L. Christie  
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### **ORDER**

Based upon the foregoing Stipulation,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the deadline for Defendants to Answer or otherwise respond to the Complaint is extended until and including February 9, 2024.

DONE IN OPEN COURT this 18<sup>th</sup> day of December, 2023.



Robert S. Lasnik  
United States District Judge

1 ///

2 Presented By:

3 CHRISTIE LAW GROUP, PLLC

4 By: /s/ Robert L. Christie  
5 ROBERT L. CHRISTIE, WSBA #10895  
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12 Approved for Entry, Copy Received;  
13 and Notice of Presentation Waived:

14 DAVIS WRIGHT TREMAINE

15 By \_\_\_\_\_  
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